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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR 24-00152 WHO
	)	
Plaintiff,	)	UNITED STATES' OPPOSITION TO
	)	DEFENDANT'S MOTION TO LIMIT VICTIM
v.	)	TESTIMONY (ECF NO. 95)
	)	
CSABA JOHN CSUKÁS,	)	Trial: October 28, 2024
	)	Court: Honorable William H. Orrick
Defendant.	)	
	)	
	)	

Counsel for the United States of America (the “government”), through Assistant U.S. Attorney Colin Sampson and Trial Attorney Lia Rettammel, respectfully submit the following Opposition to Defendant’s Motion Preclude the Jewish and Israeli victim of the alleged hate crime, S.B., from using the word “Holocaust” during his trial testimony.

Defendant’s reposts to the Public on Reddit, as well as the speakers in videos Defendant shared on

1 Reddit in mid-October 2023, refer to Israel’s “genocide” in Gaza. Exhibit 79, 81. Another video  
 2 Defendant shared publicly refers to Israel wanting to “concentrate” Palestinians. Exhibit 82. In  
 3 Defendant’s own words, Israel imposed a “police state” and “locked up entire communities” and that  
 4 “Israel is perpetuating an apartheid regime and system upon the Palestinians.” These words are coming  
 5 into the trial. The evidence will show that, as Defendant prepared to punch S.B. in the face, he said “Fuck  
 6 Jews! Fuck Israelis!”

7 But Defendant is deeply concerned that his alleged victim – which occurred because of his status  
 8 as a Jew and an Israeli – might mention the word “Holocaust” when testifying about his name. The  
 9 victim’s name was the only piece of information Defendant had about him which identified him as being  
 10 affiliated with Israel or Judaism, hence Defendant’s alleged questions that preceded the assault. The  
 11 victim’s name came from his uncle, and before that his great-grandfather, who was killed in the Holocaust  
 12 that preceded the formation of the nation he was born to and which formed the basis of the hate crime.

13 This issue is not new, and the government did not “plant” references to S.B.’s roots. S.B. has  
 14 spoken at nearly every meeting with the government about his name and what it has meant to him.  
 15 Defendant has been aware of this since the first discovery production in March, and only raises it on the  
 16 eve of trial.

17 Defendant attacked the victim because he was Jewish and Israeli. He took his victim as he found  
 18 him. For the reasons stated above, the government opposes Defendant’s Motion *in Limine*.

19  
 20 Respectfully submitted,

21 ISMAIL J. RAMSEY  
 22 United States Attorney

23 Dated: October 25, 2024.

24 /s/ Colin Sampson  
 25 COLIN SAMPSON  
 26 Assistant United States Attorney  
 27 LIA RETTAMMEL  
 28 Trial Attorney, Civil Rights Division